

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

Compliance Evaluation Inspection Report

Date of Inspection: February 28, 2017

Facility Name: Mid-America Steel Drum

Facility Address: 3950 South Pennsylvania Avenue
St. Francis, Wisconsin 53235

EPA RCRA ID Number: WIR000131367

Generator Status: Small Quantity Generator

Facility Contact: Mark Furgason – Plant Manager

EPA Representatives: Brenda Whitney - Environmental Engineer
RCRA Branch
Compliance Section 2
Land and Chemicals Division

Prepared By: Brenda Whitney 3/16/17
Brenda Whitney – Environmental Engineer Date

Approved By: Julie Morris 3/20/17
Julie Morris – Chief, Compliance Section 2 Date

Purpose of the Inspection

An unannounced Compliance Evaluation Inspection (CEI) at Mid-America Steel Drum located at 3950 South Pennsylvania Avenue in St. Francis, Wisconsin (“MASD-SF” or “Facility”), took place on February 28, 2017. This CEI was conducted in cooperation with the Wisconsin Department of Natural Resources (WDNR) and the Pipeline and Hazardous Materials Safety Administration (PHMSA). This joint effort was made in response to a whistle-blower complaint published in articles in the Milwaukee Journal Sentinel in February, 2017, and in response to letters of concern from Wisconsin politicians.

MASD-SF is listed as a small quantity generator in RCRAInfo. The CEI was an evaluation of MASD-SF’s compliance with hazardous waste regulations codified at the authorized Wisconsin Administrative Code and the Code of Federal Regulations.

Participants

The following people were present for part or all of this inspection:

Name	Government Program	Representing
Mike Griffin	Air Program	WDNR
Paul Grittner	Remediation and Redevelopment Program	WDNR
Benjamin Benninghoff	Stormwater Program	WDNR
Cathy Baerwald	RCRA	WDNR
Bryan Hartsook	Wastewater Program	WDNR
Ted Turner	PHSMA	DOT
Tiffany Ziemer	PHSMA	DOT
Kathy Halbur	Superfund	EPA
James Entzminger	Superfund	EPA
Brenda Whitney	RCRA	EPA
Ian Boyle	N/A	CLCM
Mark Furgason	N/A	CLCM
Robert Janowski	N/A	CLCM
Steele Johns	N/A	Greif
Scott Bush	N/A	Greif
Mike Higgins	N/A	MASD
Linda Benfield	N/A	Foley and Lardner
Amanda Beggs	N/A	Foley and Lardner
Sarah Slack	N/A	Foley and Lardner

Introduction

The inspection team arrived at MASD-SF at 9:45am. The receptionist at the front desk contacted Facility personnel who met us in the lobby. I displayed my credentials, and we moved to an open training area above the offices where we could discuss the inspection. We waited for the site attorneys to arrive before beginning discussions. A sign-in sheet was completed and is included in Appendix C. After introductions and delineation of the inspection parameters including sampling, we were provided a tour of the Facility. Mr. Boyle noted that he would use his own containers to take simultaneous samples. Ms. Benfield stated that any photographs taken at the site would need to be evaluated to determine if they contained confidential business information (CBI). Ms. Benfield further stated that any other generic process information garnered throughout the rest of the inspection would not be considered CBI.

Site Description

The following information about MASD-SF is based on the personal observations of the EPA inspector and on representations made during the inspection by the Facility personnel identified above or within the text.

Facility Background Information:

- MASD has three facilities in southeast Wisconsin. They are operated by Container Life Cycle Management (CLCM), which operates a total of six facilities in Wisconsin, Tennessee, Indiana, and Arkansas, and is majority owned in a joint venture by Greif, Inc.
- CLCM has been operating the facility since 2013.
- Approximately 40 people are employed at this Facility.
- Total area under roof = 45,000ft².

Process Information:

- MASD-SF reconditions steel and plastic tight-head 55-gallon drums using a wash system.
- Drums are certified by the vendors to be RCRA empty.
- Dock operators are responsible for determining by “feel” if the containers are actually RCRA empty.
- The non-RCRA empty containers are segregated on the dock and are considered “heavies.” MASD-SF will contact the vendor for pick-up. The vendor is charged \$75 per heavy drum that is returned. According to Mr. Boyle, contracts for repeat offenders are canceled or not renewed. Mr. Boyle did not quantify the number of offences that demark a vendor as a repeat offender.
- The RCRA-empty containers are segregated twice. The first is to separate the steel from the plastic containers. The second is to separate drums with oily residue from those with chemical residue.
- The steel containers are transferred into the facility on two conveyors - one for the oily drums, and one for the chemical drums.
- At the top of the conveyors, the steel drums are flipped onto a spray nozzle and are injected with hot water. The water recirculates in four holding tanks ranked from dirtiest (first wash) to cleanest (final wash).
- The hot wash tanks are vented to a wet scrubber for pH adjustment only.
- The water used to rinse the oily steel drums is routed specifically into a hot water tank that has an oil-water separator. The skimmed oil is routed to a 7,000-gallon storage tank.
- The drums are then processed through an external rinse, which uses a surfactant and water from the second hot tank.
- Steel drums are inspected for rust. Rust is removed in a muriatic acid spray chamber. The drums are rinsed in that chamber with water from the first hot rinse tank. Sodium hydroxide is added to this tank to neutralize the influent acid.
- The exterior of the steel drums is shot blasted to remove paint and labels.
- The drums are then repainted before being sent for DOT-conformance inspection.
- Plastic drums are washed and inspected in the same fashion as steel drums, but do not have to undergo acid rust-removal, shot-blasting, or painting procedures.

Waste Generation and Management:

- Clean-out residuals from the hot-water rinse tanks are managed as non-hazardous waste. It was not determined during the inspection if a waste determination was made for each individual tank, which would have separate points of generation. This waste is sent to Badger Disposal.
- Filter cake from the wastewater treatment unit is managed as non-hazardous waste. This waste is sent to Badger Disposal.

- Wastewater is managed in an on-site wastewater treatment unit. Prior to discharge to the City POTW, the water passes through a carbon filter. The operators were not aware of the carbon ever having been changed out.
- Paint booth filters are managed as non-hazardous wastes.
- Paint lines are not flushed with solvent. The paints are compatible and do not require flushing between colors. Waste paint is reused in-house as "bottom paint."
- 100% acetone is used on rags which are used to clean the paint equipment. Used rags are managed as non-hazardous waste.
- Non RCRA-empty heavies are not managed as waste at this site. According to a DOT inspector, DOT would not consider the material in the drums to be waste if the container has not been cleaned and purged at the site. The material would be considered "residue" and therefore, the drums would not need to be shipped on a hazardous waste manifest, even if the material in the containers is deemed hazardous by the vendor to whom it is returned.
- Oil removed from the oil-water separator is stored in a 7,000-gallon tank near the wastewater treatment unit. The oil is shipped to Future Environmental as "Used Oil."
- Containers that are not fit for reconditioning are squashed (steel) or pulverized (plastic) for recycling.

Site Tour

The following observations were made during the site tour:

Mike Griffin, of WDNR, took readings with a Multi-Rae monitor that was supplied by Kathy Halbur of EPA, Superfund. Cathy Baerwald and Bryan Hartsook of WDNR along with Kathy Halbur took samples of opportunity throughout the inspection. These samples were sent to the WDNR lab for analysis. A copy of the chain of custody for the samples is included in Appendix C.

The tour began at the truck dock. I observed the operators as they made their determinations by feel of whether the drums were RCRA-empty. Plastic drums are stacked two high awaiting processing. Two drums were fuming at the time of the inspections. The drums were pulled from the stacks. It was determined that the bung rings were not tightly fastened and the residual acid in the drum was reacting to moisture in the air. The steel drums are rolled over to the conveyors to be transferred inside the building for washing. The plastic drums are reloaded into trucks to be moved to another side of the building for their own wash system.

Heavies are segregated off to the side of the dock. Five heavy drums were in storage at the time of the inspection. The drums maintained their original labels and had not been opened or modified by MASD-SF. The drums were not marked with dates of receipt. Tractor trailers at the dock were opened so that we could see their contents. One of the trailers held bags of metasilicate pentahydrate which is a drum conditioner formerly used at the site for rust-preventions. Mr. Furgason stated that this material was still product. Another trailer of "non-cleanable" plastic drums was to be shredded. Mr. Furgason did not elaborate on the definition of "non-cleanable."

The inspection proceeded to the top of the washing process for steel drums. Here we observed how the drums are opened and flipped onto the washing nozzle. I did not observe any discernable liquid emerging from the drums as they were overturned. Mr. Furgason explained that the furthest tank from the beginning of the wash conveyor was the first wash tank which gets most of the residue out of the container. The next tank in line is the second wash tank, the third tank contains the oil-water separator, and the fourth tank is the cleanest, final rinse tank.

A sample was taken from the fourth tank and another sample was taken from the first tank. The water in the tanks is kept at approximately 200°F. The Multi-RAE meter picked up negligible VOC readings in the fourth tank and higher readings from the first tank. These tanks are vented to the acid scrubber.

The next step in the process is the external wash system which uses water from the second hot water tank and a surfactant. Buckets were set up to capture gray opaque drippings from the unit. Mr. Furgason stated that the drippings are not hazardous.

The drums proceeded to rust inspection. The rusty drums are processed through the muriatic acid wash. The acid is rinsed out of the drums with water from the first hot water tank. I observed some drums that had been removed from the acid wash operation that were fuming out of the open bung rings. These containers were contaminated with VOCs as indicated by odors and by readings on the Multi-RAE. Also, acid in contact with moisture, as with the drums observed on the dock, will fume. The drums were otherwise empty.

The cleaned drums are placed back onto the conveyor for blasting. One drum of spent dust was attached to the unit. Mr. Furgason stated that this waste is non-hazardous. The blasted drums proceed to paint. I observed the paint booth which is under draft to the atmosphere. According to Mike Higgins, the paints used are water-based, but also contain a low percentage of hazardous air pollutants (HAPs). One drum of "waste paint" in the area was to be used for bottom paint. One container of rags was also in the area. The operator stated that only 100% acetone is used for cleaning. The paint filters and rags are managed as non-hazardous waste.

We next observed the air scrubber unit. Some of the piping/ductwork in this area was corroded and, according to Mr. Furgason, was going to be replaced with acid resistant materials. A sample was taken from an in-ground drain that was in the vicinity of the scrubber.

The wastewater treatment unit was not running at the time of the inspection. However, one 55-gallon drum contained filter cake from the unit. A sample of the filter cake was taken. Also in this area, were eleven 55-gallon steel drums marked as "Non-Hazardous Waste." According to Mr. Furgason, these drums contained the sediment from the hot water rinse tanks. A sample was taken from one of these containers. The 7,000-gallon tank for oil was in this area. The tank was labeled as "Used Oil."

The final area observed at this plant was the plastic drum reconditioning line. The drums at this line are handled manually. The line is soon to be replaced with a new unit that is currently under construction. The line utilizes only three wash tanks because there is no oil-water separator tank needed. A strong odor of ammonia was present in this area. A sample was taken from the first

hot water rinse tank. I did not observe any discernable discharge from the containers as they were overturned onto the spray nozzle.

The tour concluded at this point and we returned to the conference room for close-out. When we returned to that area, Mike Griffin of WDNR went up to the roof of the facility and observed the scrubber stack, from which a flow of liquid was discharging into a pipe that eventually led to a storm drain. The reason the system was set up to leak in this way was not made clear during the inspection.

Records and Emergency Preparedness Review

I did not review emergency preparedness procedures for the facility. A question did arise during the CEI regarding the Facility procedures for preventing possible emergencies that may occur due to mixing of incompatible wastes. The concept of RCRA empty containers was discussed in this context. The Facility does not have any written procedures that are followed to ensure containers are RCRA empty before they are dumped in the washing system. As mentioned above, the operators use a “feel” of the container to determine RCRA-empty status.

Records were not available for review during the inspection. A list of records requested by each media during the CEI was provided to the Facility representatives. The list is included in Attachment C.

Closing Conference

During the closing conference with the MASD-SF representatives, each media discussed any observations made during the CEI. We provided the representative with the list of documents that were being requested. For my part, I informed them that I would be generating a report that included a letter, narrative discussion of the CEI and attendant photographs and checklists. Any response needed from MASD-SF according to the letter would be expected within 30 days.

The following items were discussed with MASD-SF personnel at the close of the inspection.

- Photographs were to be sent to Linda Benfield for CBI determinations. Other information discussed and collected throughout the inspection was not claimed as CBI;
- Expectations for waste determination records;
- The definition of used oil;
- Procedures for determining RCRA empty; and,
- Procedures for storing and returning heavy containers.

Appendices

Appendix A: Photograph Log

Appendix B: Small Quantity Generator checklist

Appendix C: Documents provided to the Facility during the CEI

Appendix A

Photograph Log

Inspection Date:

February 28, 2017

Facility Name and ID Number:

Mid-America Steel Drum

EPA ID: WIR000131367

Inspector and Photographer:

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division

Camera Used:

Olympus Stylus 600

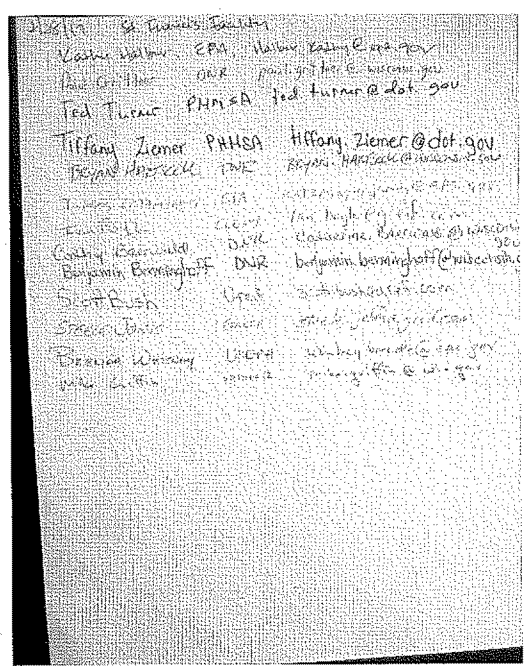
Serial Number: A47525904

3/15/2017

Photograph 1

Taken at 11:45 a.m. CST

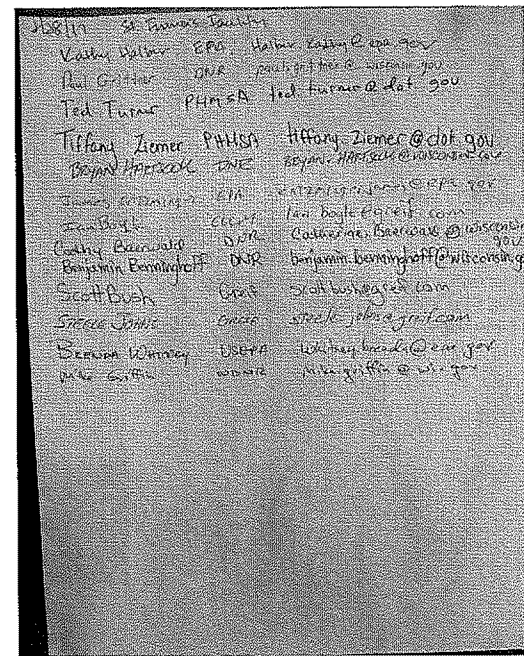
Initial photograph of sign-in sheet for the inspection.



Photograph 2

Taken at 11:45 a.m. CST

Duplicate of Photograph 1.



3/15/2017

Photograph 3

Taken at 12:28 p.m. CST

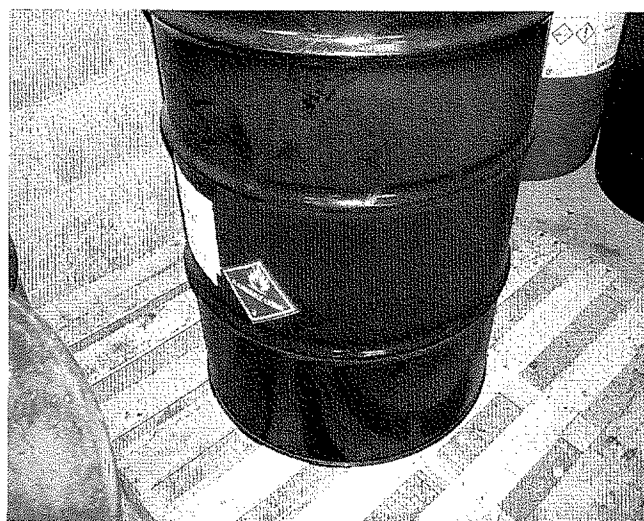
Five 55-gallon drums in various conditions were set aside on the truck dock as "Heavies." These containers were not marked with individual labels indicating that they were to be returned to the vendor. However, they were in an area that was demarked for Heavies.



Photograph 4

Taken at 12:29 p.m. CST

One of the Heavy containers had a "Flammable Liquid" label. This particular container had a seal around the bung clasp indicating that it was a product that had never been used.



3/15/2017

Photograph 5

Taken at 12:32 p.m. CST

A trailer backed up to the dock contained a pallet of Metasilicate Pentahydrate. According to Mr. Furgason, this material is used as a rust inhibiting drum conditioner.



Photograph 6

Taken at 12:38 p.m. CST

This 55-gallon drum was staged on the truck dock. Visible fumes were emanating from the bung cap. The drum had contained acid. According to Mr. Furgason, the bung cap had not been fastened tightly, and most likely some acid on the cap was reacting to moisture in the air.



3/15/2017

Photograph 7

Taken at 1:20 p.m. CST

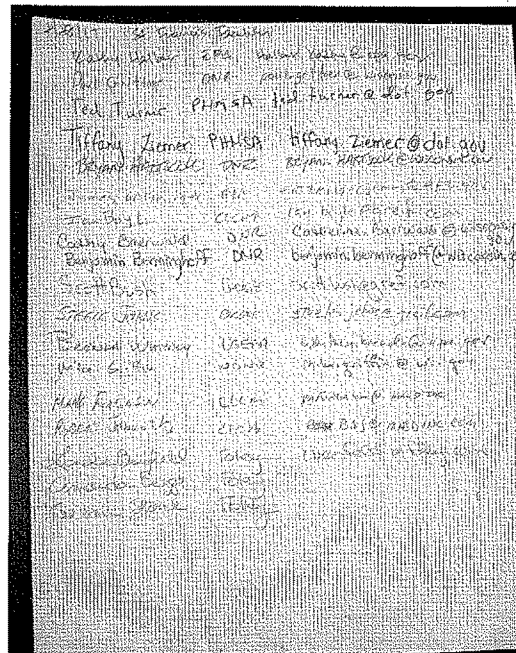
Each of the drums in this photograph had been processed through an acid wash and hot water rinse to remove rust. The two red 55-gallon drums in the forefront of this photograph were fuming. The white fumes can be seen in the bung hole of the foremost drum. These containers smelled strongly of organics though they were empty.



Photograph 8

Taken at 3:35 p.m. CST

This photograph is of the complete sign-in sheet as it appeared at the end of the inspection.



3/15/2017

Photograph 9

Taken at 3:35 p.m. CST

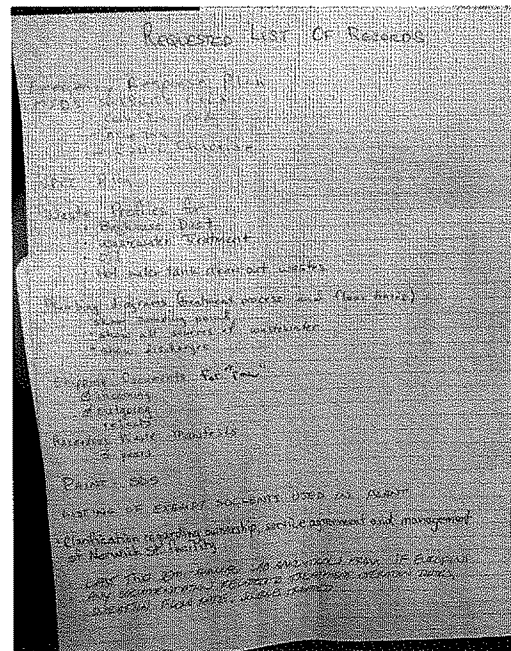
Duplicate of Photograph 8.

Names	Phone	Address	City	State	Zip	E-mail
Kathy Walker	884	Hudson Valley @ dot gov				
Paul Grutler	DNB	paugr@tth.net	Wiscasset	ME	04578	paugr@tth.net
Ted Turner	PHHSA	ted.turner@dot.gov				
Tiffany Ziener	PHHSA	tiffany.ziener@dot.gov				
Byron Haysack	DNB	byron.haysack@wiscasset.me				
James Haysack	PHH	james.haysack@dot.gov				
Joe Bogie	CUCM	Joe.Bogie@grist.com				
Cassie Bernwald	DNB	Cassie.Bernwald@wiscasset.me				
Benjamin Bernwald	DNB	benjamin.bernwald@wiscasset.me				
Scott Bush	DNB	scott.bush@grist.com				
Steve Jones	DNB	steve.jones@grist.com				
Brian Wilmsey	USFPA	brian.wilmsey@epa.gov				
Mike Grier	DNB	mike.grier@wiscasset.me				
Mark Rubelov	CEEM	markrub@ceem.net				
Robert Jankovics	CEEM	Bob.BAIE@dot.nh.gov				
Linnea Bingham	CEEM	linn.bing@ceem.net				
Demetrius Biggs	CEEM					
William Shook	CEEM					

Photograph 10

Taken at 4:16 p.m. CST

This photograph is of the "Requested List of Records" that was provided to Facility counsel at the close-out meeting.

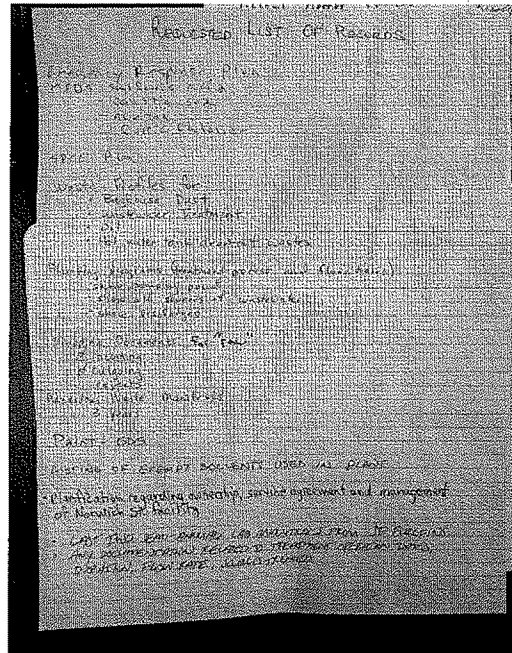


3/15/2017

Photograph 11

Taken at 4:17 p.m. CST

Duplicate of Photograph 10.



Appendix B

Checklists

Inspection Date:

February 28, 2017

Facility Name and ID Number:

Mid-America Steel Drum

EPA ID: WIR000131367

Inspector:

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division

MID AMERICA STEEL DRUM
ST. FRANCIS, WI WIR000131367



Revision: 08/04/2015
WASTE & MATERIALS
MANAGEMENT PROGRAM

SMALL QUANTITY GENERATOR INSPECTION

This Inspection Form, used for the inspection of facilities that generate between 100 kg (220 lbs) and 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month and less than 1 kg of acute hazardous waste in a calendar month, evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated (NR 662.011).	Y	662.190(2)
B. The waste determination has been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used (NR 662.011(3)).	UN	662.190(2)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers (NR 662.011(3)(a)1).	UN	662.190(2)
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility. <i>Documents have been requested.</i>	UN	662.193(1)(b)
E. Generator submitted a notification form and obtained an EPA ID# (NR 662.012).	Y	662.190(2)
Note: A subsequent notification should be submitted when there is an ownership or name change.		

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator sends waste off-site to be reclaimed under a contractual agreement. If NO, go to Question 2.E.	NO	
B. Type of waste and frequency of shipments are specified in the contractual agreement.	N/A	662.191(1)(a)
C. Vehicle used to transport the waste to the recycler and back to the generator is owned and operated by the reclaimer.	N/A	662.191(1)(b)
D. Copy of the reclamation agreement is maintained for at least 3 years from the date the agreement is terminated or expires.	N/A	662.191(2)
E. Generator sends hazardous waste off-site that is not reclaimed under a contractual agreement. If NO, go to Question 2.K.	Y	
F. The manifest is used according to the instructions in the appendix to 40 CFR part 262 (NR 662.020(1)). <i>Documents have been requested</i>	UN	662.190(2)(a)
G. The facility designated on the manifest is permitted or licensed to accept the waste (NR 662.020(2)).	UN	662.190(2)(a)
H. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility (NR 662.023(3)).	UN	662.190(2)(a)
I. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262 (NR 662.020(1)).	UN	662.190(2)(a)
J. If the generator received a shipment back as a rejected load, the returned waste has been accumulated in compliance with the container or tank standards for less than 180 days.	N/A	662.192(5)
K. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.192(5)



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WASTE & MATERIALS
MANAGEMENT PROGRAM

SMALL QUANTITY GENERATOR INSPECTION

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

L. Copy of the manifest is signed by the generator and retained until the signed copy from the designated facility is received.	UN	662.193(1)(a)
M. Copy of each manifest is kept for at least three years from the date of shipment.	UN	662.193(1)(a)
N. Hazardous waste is packaged according to applicable DOT requirements before transport (NR 662.030). <i>NONE OBSERVED</i>	N/A	662.190(2)
O. Hazardous waste is labeled according to applicable DOT requirements before transport (NR 662.031).	N/A	662.190(2)
P. Hazardous waste is marked according to applicable DOT requirements before transport (NR 662.032(1)).	N/A	662.190(2)
Q. Containers of 119 gallons and less are marked with the "Hazardous Waste - Federal law prohibit improper disposal" label before transport (NR 662.032(2)).	N/A	662.190(2)
R. Placards are offered to the initial transporter (NR 662.033).	Y	662.190(2)

Section 3: Land Disposal Restrictions

Documents have been requested

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	UN	668.07(1)
B. A copy of the LDR notification and certification for solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under ss. NR 661.02 to 661.06, or exempted from ch. 291, Stats., and chs. NR 660 to 673, subsequent to the point of generation.	N/A	668.07(1)(h)
C. Generator complies with the prohibition against dilution of wastes.	UN TBD	668.03
D. A one-time written notice is sent to each treatment, storage or disposal facility with the initial waste shipment.	UN	668.07(1)
E. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	UN	668.07(1)
F. If the waste MEETS treatment standards, the LDR notice certifies the wastes may be land disposed without further treatment.	N/A	668.07(1)
G. If the waste EXCEEDS treatment standards, the LDR notice notifies of appropriate treatment and applicable prohibitions.	UN	668.07(1)
H. Copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	UN	668.07(1)(h)
I. Generator with a contractual agreement complies with BOTH of the following: 1. The notification and certification requirements for the initial shipment of the waste subject to the agreement. 2. Retains a copy of the notification and certification with the tolling agreement for at least 3 years after the agreement is terminated or expires.	N/A	668.07(1)(i)



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WASTE & MATERIALS
MANAGEMENT PROGRAM

SMALL QUANTITY GENERATOR INSPECTION

Section 3: Land Disposal Restrictions

J. Underlying hazardous constituents have been identified for characteristic wastes.	UN	668.09(1)
K. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste code. 2. The treatment standards for all applicable listed and characteristic waste codes.	UN	668.09(2)
L. If waste is treated in containers or tanks, the generator meets with BOTH of the following (NR 668.07(1)(e)): 1. Developed a waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	NA	662.192(1)(d)

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the previous calendar year have been submitted to the Department by March 1 of the following year.	Y	662.193(3)
B. Copy of each annual report is kept for at least 3 years from the due date of the report.	UN	662.193(1)(c)
C. If the signed manifest copy is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery was submitted to the department.	UN	662.193(2)

Section 5: Preparedness and Prevention

A. Generator has ALL of the following equipment, unless the equipment is not necessary for the types of wastes handled (665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	NI	662.192(1)(d)
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (665.0033).	NI	662.192(1)(d)
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (665.0034).	NI	662.192(1)(d)
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037(1)): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the potential resulting injuries or illnesses.	NI	662.192(1)(d)



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WASTE & MATERIALS
MANAGEMENT PROGRAM

SMALL QUANTITY GENERATOR INSPECTION

Section 5: Preparedness and Prevention

E. Aisle space is provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).

Y

662.192(1)(d)

RCRA - Empty Drums Are Stacked w/out Aisle Space

Section 6: Emergency Procedures & Personnel Training Requirements

A. A person has been identified as an emergency coordinator who is responsible for coordinating all emergency response measures and is on the premises or able to reach the site within a short period of time.

Y

662.192(1)(e)1

B. ALL of the following information is posted next to the telephone:

1. Name and telephone number of the emergency coordinator.
2. Location of fire extinguishers, spill control material and, if present, fire alarm.
3. Telephone number of the fire department unless the generator has a direct alarm.

NI

662.192(1)(e)2

C. In the event of an emergency, the emergency coordinator takes the following actions:

1. In the event of a release, telephone the division of emergency management (800-943-0003) and comply with NR 706.
2. In the event of a fire, call the fire department or attempt to extinguish the fire, if appropriate.
3. In the event of a spill, contain the flow of hazardous waste to the extent possible and clean up the hazardous waste and contaminated materials or soil.
4. If there is a release that could threaten human health outside the facility or if a spill reaches surface water, immediately notify the national response center (800-424-8802).

NI

662.192(1)(e)4

D. All employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal operations and emergencies.

NI

662.192(1)(e)3

Section 7: Container Accumulation

A. Generator accumulates hazardous waste in containers. If NO, go to Section 8.

NONE OBSERVED

No

B. The accumulation start date is clearly marked and visible for inspection on each container.

NA

662.192(1)(d)1

C. All containers are clearly marked with the words "Hazardous Waste".

NA

662.192(1)(d)2

D. The contents of a container that is leaking or in poor condition are transferred to another container in good condition (NR 665.0171).

NA

662.192(1)(b)

E. Containers are made or lined with materials compatible with the waste (NR 665.0172).

NA

662.192(1)(b)

F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).

NA

662.192(1)(b)

G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).

NA

662.192(1)(b)

H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).

NA

662.192(1)(b)

I. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).

NA

662.192(1)(b)



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Section 7: Container Accumulation

J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)). *NA* 662.192(1)(b)

K. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)). *NA* 662.192(1)(b)

Section 8: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 9. *None OBSERVED* *NA*

B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area. *NA* 662.192(4)(a)

C. Satellite containers are under the control of the operator of the process generating the waste. *NA* 662.192(4)(a)

D. Containers are always kept closed except when it is necessary to add or remove waste (NR 665.0173(1)). *NA* 662.192(4)(a)1

E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172). *NA* 662.192(4)(a)1

F. Containers are marked "Hazardous Waste" or with other words that identify the contents. *NA* 662.192(4)(a)2

G. If the container is leaking or in poor condition, contents are transferred to another container in good condition (NR 665.0171). *NA* 662.192(4)(a)1

H. Container holding the excess waste is marked with the date the excess amount begins accumulating. *NA* 662.192(4)(b)

I. Generator complies with the 180 day accumulation requirements with respect to the excess amount within 3 days of it being generated. *NA* 662.192(4)(b)

Section 9: Used Oil

A. Used oil is managed on-site. If NO, go to Section 10. *The oil collected at this site is solid waste.* *No*

B. Used oil containing $\geq 1,000$ ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met. *NA* 679.10(2)(a)2

C. Used oil containers and tanks are in good condition and not leaking. *NA* 679.22(2)

D. Used oil containers and tanks are marked "used oil". *NA* 679.22(3)(a)



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Section 9: Used Oil

E. Transporter has an EPA ID number, except when generator self-transport or has a tolling agreement.	N/A	679.24
F. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.	N/A	679.10(3)(a)
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	N/A	679.23
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	N/A	679.11

Section 10: Universal Waste

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 11. <i>NONE OBSERVED</i>	N/A	
Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.		
B. Universal waste has not been disposed, treated or diluted. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	N/A	673.11
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	N/A	673.13
D. Universal waste lamps and pesticides are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	N/A	673.13
E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	N/A	673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler.	N/A	673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N/A	673.15(2)
H. Length of accumulation time is demonstrated by any of the following: 1. Each container is marked or labeled with the earliest date the waste is generated or received. 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific accumulation area identified with the earliest date the waste was generated or received.	N/A	673.15(3)
I. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	UN	673.16
J. ALL of the following are met when a release occurs: 1. Release is immediately contained. 2. A waste determination is made. 3. Spill residue is disposed of properly as solid or hazardous waste.	N/A	673.17



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Section 10: Universal Waste

K. Handler sends the waste to a destination facility, foreign destination or another handler. Indicate the facilities in the comments section.	UN	673.18(1)
L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	UN	673.18(3)
M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form. 1. Universal waste are sorted or disassembled. 2. Recalled pesticides are managed. 3. Universal waste shipments have been rejected. 4. Universal waste shipments have included hazardous or solid waste. 5. Universal waste is self-transported.	N	

Section 11: Waste Minimization Certification

A. Small quantity generator has made a good faith effort to minimize the amount of waste generated (NR 662.027(2)).	UN	662.190(2)(a)
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Section 12: Generator Status Evaluation

A. Between 220 lbs (100 kg) and 2,205 lbs (1,000 kg) of waste is generated in any month. <i>NONE OBSERVED</i>	UN	662.190(1)
B. Waste is accumulated for 180 days or less.	UN	662.192(1)
C. Waste is accumulated for 270 days or less if the generator must ship 200 miles or more.	NA	662.192(2)
D. Less than 13,230 lbs (6,000 kg) of waste is accumulated.	Y	662.192(1)(a)
E. Describe any other activities the generator is conducting at the facility. <i>* Storage of oil in 7,000-gallon tank. An analysis of the oil has been requested.</i>		

Appendix C

Documents generated during the Inspection:

- Sign-in Sheet
 - Record Request Sheet
 - Chain of Custody for Samples
-

Inspection Date:

February 28, 2017

Facility Name and ID Number:

Mid-America Steel Drum

EPA ID Number: WIR000131367

Inspector:

Brenda Whitney

Compliance Section 2

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Land and Chemicals Division

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REQUESTED LIST OF RECORDS

Emergency Response Plan

MSDS - sulfuric acid

- Caustic Soda

- Acetone

- Ferric Chloride

SPCC Plan

Waste Profiles for

• Baghouse Dust

• Wastewater Treatment

• Oil

• Hot water tank clean-out wastes

Plumbing diagrams (treatment process and floor drains)

- show sampling point

- show all sources of wastewater

- show discharges

Shipping Documents for "raw"

• incoming

• outgoing
rejects

Hazardous Waste Manifests

- 3 years

PAINT - SDS

LISTING OF EXEMPT SOLVENTS USED IN PLANT

• Clarification regarding ownership, service agreement and management of Norwich St. facility

• LAST TWO SEMI-ANNUAL LAB ANALYTICALS FROM JF EUROFINIS

• ANY DOCUMENTATION RELATED TO TREATMENT OPERATION DATES, DURATION, FLOW RATE, SOURCES TREATED

**State of Wisconsin
Department of Natural Resources**

Chain of Custody Record
Form 4100-145 (R 2/01)

[illegible]

